

# Exhibit I

**DECLARATION OF RYAN BRUNSINK  
MANAGING ATTORNEY OF REMOVAL DEFENSE PROGRAMS  
FOR PENNSYLVANIA IMMIGRATION RESOURCE CENTER (PIRC)**

*I, Ryan Brunsink, make the following statements on behalf of Pennsylvania Immigration Resource Center ("PIRC"). I certify under penalty of perjury that the following statement is true and correct pursuant to 28 U.S.C. § 1746.*

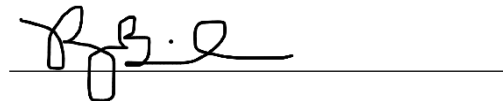
1. My name is Ryan Brunsink, and I am the Managing Attorney for Removal Defense Programs at PIRC. PIRC's office is in York, Pennsylvania. PIRC provides free legal educational information and representation on immigration matters to noncitizens across the commonwealth of Pennsylvania. PIRC is part of the Pennsylvania Immigrant Family Unity Project ("PAIFUP"), which is the primary group of organizations dedicated to providing legal services to indigent immigrant adults detained by Immigration and Customs Enforcement ("ICE") at the Moshannon Valley Processing Center ("Moshannon Valley").
2. PIRC operates Removal Defense Programs with several main components: (1) the Legal Orientation Program ("LOP"), providing educational and pro se services in the form of legal education "know your rights" ("KYR") presentations, conducting individual consultations (intakes), and providing pro se assistance to unrepresented detained noncitizens in the custody of ICE at facilities located in Pennsylvania; (2) connecting unrepresented detained noncitizens who cannot afford a lawyer with pro bono attorneys for cases at both the trial and appellate court levels; and (3) providing in-house representation for indigent individuals who qualify under separate programming and funding.
3. PIRC is the sole provider of LOP services in the Commonwealth. For years, LOP funding enabled PIRC staff to travel regularly to Moshannon Valley to provide legal education KYR presentations, individual consultations, and pro se workshops to noncitizens who are detained and do not have counsel. PIRC's LOP team sent two to four staff members to provide services at Moshannon Valley twice monthly, most often on Thursdays and Fridays on consecutive days. Additionally, PIRC provided similar services remotely in between in person visits and responded to inquiries from detainees each day through the pro bono telephone platform and through messaging on electronic tablets available to some detainees.
4. LOP services at Moshannon Valley are critical because of both the size and remote location of the facility. Moshannon Valley is one of the largest ICE facilities in the country. Moshannon has a total potential capacity of roughly 1,900. It serves as a regional hub for ICE detention. Many states surrounding Pennsylvania have legislated ICE detention out of their states, so Moshannon Valley receives many individuals from all over the northeast and mid-Atlantic regions of the U.S. Located in Clearfield County, Pennsylvania, the facility is very remote and few private immigration practitioners ever visit in person.
5. In the past year, PIRC has provided LOP at Moshannon Valley to 1397 people.
6. PIRC has also served as the primary referral mechanism for pro bono placement at Moshannon Valley. Through the LOP services, PIRC identified individuals who qualify for additional services, such as in-house PIRC representation under separate funding or referral to other nonprofit legal service organizations based on residence prior to detention. While

our LOP packets do not include information on filing habeas petitions, we do make referrals for habeas representation whenever possible.

7. PIRC's LOP program is no longer in effect. Without warning, on January 22, 2025, the Department of Justice issued a national contract stop work order which paused funding for PIRC's LOP program. While the stop work order was subsequently rescinded after litigation, a second stop work order was issued on April 10, 2025, and became effective April 15, 2025.
8. Even if PIRC's LOP were to resume, it would be very challenging for individuals detained at Moshannon Valley to consult with an attorney quickly to file a habeas petition. PIRC's LOP program is at Moshannon Valley twice a month, and while PIRC responds to requests for information and assistance in between as best we can, we are not normally able to respond to all questions, let alone within 12 hours of receiving them. It normally takes PIRC up to a week to consult with individuals who reach out via our phone number.
9. Other practical considerations make it difficult for individuals detained at Moshannon to promptly consult with an attorney. Legal calls can take days, or sometimes weeks, to set up as there are limited slots available per housing unit. It is also not possible to arrange for legal calls on the weekend.
10. Pro se people face additional challenges. Detained individuals normally only have access to the law library once a week for a few hours at most. In PIRC's experience, in a best-case scenario, it normally takes a person several visits to the law library – meaning several weeks – to pull together something to file. This means filing a habeas within 14 days as a pro se person would be impossible.
11. Moreover, pro se individuals have no way to file electronically, so they would have to mail the habeas petition, which often causes additional delay.
12. There are also language access considerations. When we would do LOP, we heard from detained individuals about language access issues they faced daily—from not being able to talk with staff, to not understanding what documents they received in English from ICE, to no interpretation offered—that are all common language access issues at Moshannon.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 29th of April 2025, in Lancaster, Pennsylvania.



**Ryan Brunsink**

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